

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

MAY 4 1995

In the Matter of )

Computer III Further Remand Proceedings: )

Bell Operating Company Provision of Enhanced Services )

CC Docket No. 95-20

**REPLY COMMENTS**

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**REPLY COMMENTS**

**I. INTRODUCTION**

GeoNet Limited, L.P. in its comments filed March 7, 1995 raised concerns about the reluctance of the Tier 1 companies to provide sufficient technical information on their network architecture planning. In our comments we stated that our experience in the IILC is evidence that such reluctance to disclose technical descriptions of network architecture plans impedes the efforts of enhanced service providers (ESPs) to create the advanced services which will utilize new technologies such as Signalling System #7 (SS7), Integrated Services Digital Network (ISDN), and the Advanced Intelligent Network (AIN). We described how the result of such reluctance diminishes the IILC and 120 day processes which are intended to facilitate equal access by ESPs to the functionality of those new technologies.

**Bell Atlantic, in section V, part B, "Network Disclosure", of their comments under this proceeding advocates an even further reduction in the responsibilities of the Tier 1 companies for network disclosure. Since Bell Atlantic is advocating even less disclosure requirements, GeoNet feels compelled to respond.**

## **II. BACKGROUND**

**GeoNet operates a line of business which has as its objective the development of certain enhanced telecommunications services. Those enhanced services are intended to provide more efficient, cost effective and reliable network interconnection management for enterprise computer networks. The design and development of those services is in process at this time with the design goal being the most effective use of new technologies such as SS7, ISDN, and AIN to manage networked computer applications.**

**GeoNet must have an intimate understanding of the network architecture plans of the network providers with respect to those new technologies in order to fully meet that goal. To that end, GeoNet has been participating in the Information Industry Liaison Committee (IILC), the Committee T1, and in one-on-one discussions with Tier 1 companies to discuss its network access requirements necessary to most effectively provide its enhanced services. Openness and cooperation on the part of the Tier 1 companies have not been characteristic of these activities. With the exception of the interaction with Ameritech, these activities have resulted in very little disclosure of the needed information.**

### **III. THE EVOLVING INTELLIGENT NETWORK**

One definition of the evolving Intelligent Network is provided in the BellSouth Supplemental Comments filed under CC Docket 91-346, in which BellSouth describes its proposed network architecture for open access to BellSouth's Advanced Intelligent Network (AIN). BellSouth describes a three phase implementation of AIN access, where Phase I relates to the service management system and the latter two phases correspond to Bellcore's AIN releases 0.1 and 0.2, respectively. Phase II describes a means for direct interconnection of third party providers' service platforms to BellSouth's network. Phase III is an access scheme with SS7/ISDN interworking which will "have access to all of the capabilities of the SS7 network". The anticipated dates for availability of the Phase I and II AIN network access capabilities are 1995 and 1996.

### **IV. THE IMPORTANCE OF NETWORK PLAN DISCLOSURE**

Disclosure of network architecture planning information should have three primary objectives; to provide ESPs the information they need to design new enhanced services, to encourage input from the users as to their future needs, and to allow network providers to receive the feedback by which they can validate their network design decisions. To illustrate these objectives, GeoNet offers the experience gained in recent activities as an example.

### **A. Providing Network Plan Information.**

In order to design its enterprise network enhanced services for most effective use of the intelligent network, GeoNet must be fully aware of the capabilities of the network and how those capabilities can be accessed. If the Tier 1 companies withhold the technical description of the network functions being designed until the new technologies are being deployed, GeoNet will suffer large delays in its schedule for the development of its enhanced services. Those Tier 1 companies which decide to provide competing enhanced services will have gained the opportunity to establish market control before GeoNet can enter the market.

### **B. Encouraging Input From The Users.**

The network architecture plans of the Tier 1 companies do not appear to reflect the needs of enterprise data networks. If such is the case, then more input is needed from ESP's and users to define their needs. GeoNet submits that the disclosure of more network architecture planning information to ESPs and users will stimulate a response from them which will provide the input needed.

### **C. Receiving Feedback.**

GeoNet's experience is that the Tier 1 companies have almost totally neglected to consider data network management needs in their SS7 and AIN network designs. GeoNet contends that, with the exception of Ameritech and possibly BellSouth, the Tier 1 companies are still not considering data network management needs, even as of the present date.

**In GeoNet's Comments under this proceeding and in the supporting documents for our Ex-Parte meeting with the Commision staff under docket 91-346, we have tried to show how the management of enterprise data networks is vital to the US national interest. GeoNet contends that the national interest requires urgent consideration of the data network management needs in the design and implementation of the US Intelligent Network infrastructure.**

**If the Tier 1 companies have not seen the need for data network management, then it is time they recognize the need. There is, of course, another possible explanation; that some of the Tier 1 companies are withholding disclosure of their Intelligent Network architecture plans in order to gain unfair market advantage in the market for data network enhanced services.**

**GeoNet contends that, regardless of the motives of the Tier 1 companies, it is urgent and essential to the US national interest that *more, not less*, network architecture plan disclosure be required of the Tier 1 companies. Technical descriptions of network functionality should be made before deployment of new technologies as well as advanced disclosure of market trials which involve new technologies.**

## **V. SUMMARY AND CONCLUSIONS**

**In summary GeoNet states that our experience shows that lack of adequate disclosure of network architecture plans by the Tier 1 companies has diminished the processes whereby Enhanced Service Providers can obtain non-discriminatory access to the Intelligent Network. GeoNet states that such access is required for the development of enterprise data network management enhanced services and contends that the development of such services is a matter of urgent national interest.**

**In conclusion, GeoNet argues that, contrary to the Bell Atlantic position, *more, not less*, disclosure of Tier 1 company network architecture plans is required to satisfy the national interest.**

**We thank you for the opportunity to enter our reply comments into the record.**

**Respectfully submitted,**

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